

HONORABLE BRIAN LYNCH
Chapter 11
HEARING DATE: JANUARY 11, 2018
HEARING TIME: 9:30 AM
COURTROOM: TACOMA, ROOM I
RESPONSE DEADLINE: JANUARY 4, 2018

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

In Re

CDC Properties I, LLC,

Debtors.

No. 11-41010-BDL

**NOTICE OF MOTION AND HEARING
ON EQUITY FUNDING/CENTRUM
FINANCIAL SERVICES' MOTION FOR
LEAVE TO COMMENCE AN ACTION
IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN
DISTRICT OF WASHINGTON OR
ANOTHER COURT OF COMPETENT
JURISDICTION**

PLEASE TAKE NOTICE that creditor Equity Funding/Centrum Financial Services, Inc. ("Equity Funding"), will bring before the above Court its Motion for Leave to Commence an Action in the United States District Court of Washington or Another Court of Competent Jurisdiction (the "Motion").

The Motion is set for hearing as follows:

JUDGE: Brian D. Lynch

PLACE: Tacoma, Room I

TIME: 9:30 a.m.

DATE: January 11, 2018

Consolidated No. 17-2-03914-4

NOTICE OF HEARING - 1

COLE | WATHEN | LEID | HALL, P.C.
303 BATTERY STREET
SEATTLE, WA 98121-1419

1 Copies of the Motion may be obtained at the United States Bankruptcy Court Clerk's
2 office or by contacting Rick Wathen, at the address listed below.

3 IF YOU OPPOSE THE MOTION, you must file your written response with the Clerk
4 of the United States Bankruptcy Court at the U.S. Courthouse, located at 1717 Pacific Avenue,
5 Suite 2100, Tacoma, Washington 98402, and deliver copies to Rick Wathen, at the address
6 listed below NOT LATER THAN THE RESPONSE DATE, which is JANUARY 4, 2018. If
7 you file a response you are also required to appear at the hearing.
8

9 IF NO RESPONSE IS TIMELY FILED AND SERVED, THE COURT MAY, IN ITS
10 DISCRETIO, GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER
11 NOTICE, AND STRIKE THE HEARING.
12

13 Dated this 19th day of December, 2017.
14
15

16 **COLE | WATHEN | LEID | HALL, P.C.**

17 s/Rick J Wathen

18 Rick J Wathen, WSBA #25539

19 Attorneys for Centrum/Equity

20 303 Battery Street

21 Seattle, WA 98121

22 P: 206-622-0494 / F: 206-587-2476

23 rwathen@cwllhlaw.com
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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the parties mentioned below via ECF Court Filing and electronic notification:

CDC Properties I, LLC

c/o Keven A. Bay
Brad A. Goergen
Mark D. Northrup
kbay@tousley.com
plewis@tousley.com
kstokes@tousley.com
efile@tousley.com
brad.goergen@millernash.com
mark.northrup@millernash.com
dona.purdy@millernash.com

John Rizzardi
CAIRNCROSS & HEMPELMANN, P.S.
524 Second Avenue, Suite 500
Seattle, WA 98104-2323

Eric Orse

c/o Diana K. Carey
Karr Tuttle Campbell
701 Fifth Ave Ste 3300
Seattle, WA 98104
dcarey@karrtuttle.com

United State Trustee

Hillary Bramwell Mohr
USTPRegion18.SE.ECF@usdoj.gov
Hilary.b.mohr@usdoj.gov
Tara.Maurer@usdoj.gov
young-mi.petteys@usdoj.gov
martha.a.vandraanen@usdoj.gov

Mariners Portfolio LLC

Olympia Office LLC

Seahawk Portfolio LLC

WA Portfolio LLC

c/o Donald A. Bailey
donald.bailey@shaferbailey.com

Consolidated No. 17-2-03914-4

NOTICE OF HEARING - 3

COLE | WATHEN | LEID | HALL, P.C.
303 BATTERY STREET
SEATTLE, WA 98121-1419

1 **MLMT 2005-MCP1 Washington Office Properties LLC**

2 c/o Theodore A Cohen

3 Alan M. Feld

4 tcohen@sheppardmullin.com

5 amontoya@sheppardmullin.com

6 afeld@sheppardmullin.com

7 **Washington State Dept of General Administration**

8 c/o Brian Faller

9 brianf@atg.wa.gov beckym@atg.wa.gov

10 **Bingo Investments LLC**

11 c/o R. Bruce Johnston

12 bruce@rbrucejohnston.com

13 **Midland Loan Services, Inc.**

14 c/o Brian L Lewis

15 brian.lewis@klgates.com

16 bankruptcyecf@klgates.com

17 **Wells Fargo Bank**

18 c/o Brian L Lewis

19 brian.lewis@klgates.com

20 bankruptcyecf@klgates.com

21 **Hyun J Um and Jin S. Um**

22 c/o J. Todd Tracy

23 todd@thetracylawgroup.com

24 ecf@thetracylawgroup.com

25 **Thomas W. and Patricia A. Price**

26 c/o J. Todd Tracy

27 todd@thetracylawgroup.com

ecf@thetracylawgroup.com

Debtor CDC Properties I LLC

c/o Brad A Goergen

brad.goergen@millernash.com

Henry W. Dean as Trustee for the Sharon Graham Bingham 2007 Trust

c/o Emanuel Jacobowitz and Nathan J. Arnold

manny@jlaw.com

Consolidated No. 17-2-03914-4

NOTICE OF HEARING - 4

COLE | WATHEN | LEID | HALL, P.C.

303 BATTERY STREET

SEATTLE, WA 98121-1419

P: 206-622-0494 / F: 206-587-2476

1 DATED at Seattle, Washington, this 19th day of December, 2017.

2 s/Sonia Chakalo
3 Sonia Chakalo, Legal Assistant
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